

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,)	PROMESA
)	Title III
)	No. 17 BK 3283-LTS
as representative of)	(Jointly Administered)
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>)	
)	
Debtors.)	
)	
In re:)	PROMESA
)	Title III
)	No. 17 BK 4780-LTS
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,)	
)	
as representative of)	
PUERTO RICO ELECTRIC POWER AUTHORITY ("PREPA"))	
)	
Debtor. ¹)	
)	

**JOINT INFORMATIVE MOTION REGARDING
COBRA ACQUISITIONS LLC'S MOTION TO LIFT THE STAY ORDER**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Pursuant to the Court's *Order Regarding Procedures for August 4-5, 2021, Omnibus Hearing* [Case No. 17-BK-3283, ECF No. 17522], Cobra Acquisitions LLC ("Cobra"), the Puerto Rico Electric Power Authority ("PREPA"), by and through the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board") and the Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF," and together with PREPA and the Oversight Board, the "Government Parties" and, the Government Parties together with Cobra, the "Parties"). The Parties respectfully states as follows:

1. The Parties will appear telephonically at the omnibus hearing on *Cobra Acquisitions LLC's Motion to Lift the Stay Order* [Case No. 17-BK-3283, ECF No. 16328] (the "Motion"), as well as any and all objections, responses, statements, joinders and replies to the Motion.

2. The following individuals may appear to speak on behalf of the parties:

- a. Cobra: Abid Qureshi and Scott Heimberg
- b. Oversight Board: Scott P. Cooper

3. The Parties understand the Court has allocated 14 minutes for a hearing on the Motion. The Parties have agreed to allocate such time as follows, listed in the order in which the Parties will present:

- a. Cobra's Opening Argument: 5 minutes.
- b. Government Parties' Argument:
 - i. Oversight Board: 7 minutes
- c. Cobra's Rebuttal: 2 minutes.

WHEREFORE, the Parties respectfully request that the Court take notice of the above.

July 30, 2021

New York, New York

Respectfully submitted,

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CERTIFICATE OF SERVICE

We hereby certify that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/Alana M. Vizcarrondo-Santana
USDC-PR 301614